## Gregory Kinoian Law LLC

8-15 Elaine Terrace Fair Lawn, NJ 07410-5709 (201) 741-6341 (voice or text) gkinoian@gmail.com

Of Counsel to Aboyoun Dobbs LLC 77 Bloomfield Avenue Pine Brook, NJ 07058 Tel: (973) 575-9600

(973) 575-1925

October 22, 2020

## By CM-ECF and E-Mail chambers\_of\_rg@njb.uscourts.gov

Fax:

The Honorable Rosemary Gambardella United States Bankruptcy Judge United States Bankruptcy Court for the District of New Jersey 50 Walnut Street, 3rd Floor Courtroom 3E Newark, New Jersey 07102

Re: In re Health Tech Harbor, Inc., Involuntary Chapter 7 Case No. 20-19017 (RG)

Submission of Proposed Mediation Order and Proposed Initial Pre-Trial Scheduling Order and Request for Adjournment and Rescheduling of Status Conference Currently Scheduled for October 27, 2020 at 10:30 a.m.

## Dear Judge Gambardella:

With the consent of counsel to the Petitioning Creditors in the above-referenced matter, we respectfully request entry of the two proposed orders submitted herewith. One is the proposed Mediation Order, among other things, appointing Morris Bauer of Norris McLaughlin, P.A. as mediator. The other is the proposed Initial Pre-Trial Order along the terms discussed during our October 13, 2020 status conference. Please be advised that mediation is currently scheduled for November 4, 2020.

Also with the consent of counsel to the Petitioning Creditors, we respectfully request that the continuation of the status conference, currently scheduled for October 27, 2020 at 10:30 a.m., be adjourned and rescheduled to either November 10, 2020 or November 17, 2020. Either date is acceptable to counsel.

## Gregory Kinoian Law LLC Of Counsel to

Aboyoun Dobbs LLC

Hon. Rosemary Gambardella October 22, 2020 Page 2 of 2

Please contact the undersigned and Mr. Mascitti of McCarter & English, LLP if there are any questions or issues regarding any of the foregoing.

Respectfully yours,

Gregory S. Kinoian

(Member of NJ and NY Bars)

**Enclosures** 

(All by e-mail with enclosure CC:

regon X. Kursam

Gregory J. Mascitti, Esq. (gmascitti@mccarter.com)

Phillip Pavilick Esq. (ppavlick@mccarter.com)

Jeffery Thomas Testa, Esq. (jtesta@mccarter.com)